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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

JAYLYN WESTENBROEK, HANNAH,)
 HOLTMEIER, ALLISON COGHAN, GRACE)
 CHOATE, MADELINE RAMAR, and MEGAN)
 KOSAR, on behalf of themselves and)
 derivatively on behalf of KAPPA KAPPA)
 GAMMA FRATERNITY,)
)
 Plaintiffs,)

v.)

Civil Action No.: 23-CV-00051-ABJ

)
 KAPPA KAPPA GAMMA FRATERNITY, an)
 Ohio non-profit corporation, as a Nominal)
 Defendant and as a Direct Defendant;)
 MARY PAT ROONEY, President of the)
 Fraternity Council of KAPPA KAPPA GAMMA)
 FRATERNITY, in her official capacity, KAPPA)
 KAPPA GAMMA BUILDING CO., a Wyoming)
 non-profit corporation, and ARTEMIS)
 LANGFORD,)
)
 Defendants.)

NOTICE OF ONGOING ATTACKS BY PLAINTIFFS

COMES NOW Defendant, Artemis Langford, and hereby submits the following Notice in Support of her pending Motion to Dismiss, currently under advisement before this Court, [ECF 49; ECF 49-1] as Follows:

1. Following this Court's hearing on Monday, Ms. Langford has faced another media firestorm in which "Save Sisterhood," an online group affiliated with Plaintiffs that was created in support of this suit, has participated.¹

¹ Attached hereto as Exhibit 1 is a true and accurate copy of the "Save Sisterhood" website, which features the Complaint in this matter and invites readers to "Follow us on Twitter" at "@Save_Sisterhood."

Attached hereto as Exhibit 2 is a true and accurate copy of a July 17, 2023 post by @Save_Sisterhood in which they state "Our sorority allowed a biological man to join. We're suing for women's rights." The profile picture for @Save_Sisterhood is the same photograph used by Plaintiffs to raise money for their counsels' attorney fees.

Attached hereto as Exhibit 3 is a true and accurate copy of a May 2, 2024 post by @Save_Sisterhood in which they advertise the "Save Sisterhood" rally outside the Tenth Circuit following oral arguments on appeal in this matter, which hosted Plaintiffs and their counsel as speakers.

Attached hereto as Exhibit 4 is a true and accurate copy of a June 3, 2023 post by @Save_Sisterhood reading "Thank you @MegynKeyllyShow for including our brave Sorority Women in this amazing statement. We couldn't agree more and together we can #savewomensspaces."

2. In the last two days, these new negative posts about Ms. Langford have been viewed over 681,000 times and counting.²
3. “Save Sisterhood,” has participated in this public harassment.³

Attached hereto as Exhibit 5 is a true and accurate copy of a May 14, 2024 post in which Plaintiff Holtmeier and Plaintiff Cohan gave an update on the Tenth Circuit argument, which includes the #savesisterhood hashtag.

² Attached hereto as Exhibit 6 is a true and accurate copy of a post regarding Ms. Langford that has been viewed over 483,000 times as of the time of filing. Due to the rapid number of views, the exhibit provided herewith does not reflect the most current view count.

Attached hereto as Exhibit 7 is a true and accurate copy of another post regarding Ms. Langford that has been viewed over 198,000 times as of the time of filing. Due to the rapid number of views, the exhibit provided herewith does not reflect the most current view count.

³ Attached hereto as Exhibit 8 is a true and accurate copy of a post by Save_Sisterhood platforming the recent negative attention upon Ms. Langford.

Attached hereto as Exhibit 9 is a true and accurate copy of a comment by Save_Sisterhood stating that Ms. Langford “was part of the sorority’s agenda so they loved the framing. Leadership is that blind. And sadly all sororities allow men at the moment — as long as they put on lipstick and a skirt! The fight continues.”

4. The article itself is one of the few positive media portrayals of Ms. Langford.
5. But rather than reflect the positive sentiment in the article, the public commentary in response to the posts reflects the negative public perception brought about by Plaintiffs' actions before this Court.
6. Comments include:
 - a. Isn't this the one that would get an erection while watching the girls? [35k views on this comment alone]
 - b. Do they mention how he'd stare at the girls while they dressed and get erections? [16k views on this comment alone]
 - c. @MegynKellyShow did an episode on this insanity. Totally infuriating that women were subjected to this abuse. [17k views on this comment alone].
 - d. His name is Dallin Langford. I was the only one to report this. Major media outlets are pandering to perverts. [11k views].
 - e. "A young man joined a sorority. Then the young women in the sorority understandably spoke out against his inclusion in their organization and, worse, their living space, particularly after the man would begin leering at them with a visible erection in his pants. A 21-year-old University of Wyoming male student with piss-poor grades and a cross-sex paraphilia was looking for women to creep on and pressured a sorority to admit him. Naturally, he faced

Attached hereto as Exhibit 10 is a true and accurate copy of a comment by Save_Sisterhood in which they state that Ms. Langford's "behavior was threatening to women."

- extensive public backlash followed by a federal lawsuit and an attempt to kick him out of the sorority which he categorically did not belong in.” [7.2k views on this comment alone].
- f. Have a read of the gaslighting because women said no to a man who was placed in the sorority house by the university authorities who think his human rights outweigh women’s human rights. Apparently it’s his human right to watch these women naked and in a bathroom and to walk around with a boner. Once again when the women said NO and we don’t consent it’s the young women that were attacked for protecting their dignity their privacy and their right to freedom of speech and thought. The MSM attacks the women as does the university. [4k views].
 - g. This was the creepy bloke with a boner? [2.4k views on this comment alone].
 - h. They HAD to accept him, against their will. According to his "sisters" he walked around with a boner & leered at them. And there was nothing they could do. [5.2k views on this comment alone].
 - i. Pervert sexually harasses college girls. There, I fixed the headline. [2.8k views on this comment alone].
 - j. This 6'2" guy, who used to leer at them with a visible erection, took pictures of them at a slumber party, and made inappropriate comments. And his name is Artemis Langford. [4k views on this comment alone].
 - k. "A cross-dressing man was looking for women to spy on while getting his jollies wearing their underwear. The actual women refused to play along." [1.2k views on this comment alone].

- l. He sat and stated at his "sisters" while wearing leggings that showed off his visible erection, but yeah, he's the victim. So tired of this. [1.6k views on this comment alone].
- m. That is a MAN that sat in the locker/changing room watching the young college girls change. Several times, he was seen with an erection and started having something over his lap when he was watching them. Several girls complained but were called teansphobic for saying that a MAN was watching them change. They started changing in other rooms, and we're called transposition for not allowing a MAN to watch them change. Absolutely retarded behavior by UW and the sorority. [1.7k views on this comment alone].
- n. It's crazy how the media keeps portraying these perverts as the victims of harassment when all they want to do is be able to see girls naked without their consent. [1.6k views on this comment alone].
- o. And he would stare at them with an erection and ask them questions about their underwear. Utterly disgusting. And they weren't allowed to kick him out. [1.4k views].
- p. I recall this story. He'd sit in the dark and not announce his presence and watch them change, among many other things. Can't believe they think we're gonna buy this. [1.1k views on this comment alone].
- q. A mentally ill man imposed himself on women who had intentionally sought a male-free space for living and socializing. When they reasonably objected to his leering presence, he pretended to be the victim and weaponized the media and the courts. [4.7k views on this comment alone].

7. Other comments have fewer views but accuse Ms. Langford of criminal sexual activity and ask whether death threats against her are “well deserved.”
- a. One concerning commenter posted: "The man's a fucking pervert who rubbed his penis on a frequent basis while staring at the students in that sorority. The death threats he received are either fake, or well deserved". How's that?
 - b. Is this the one who was secretly filming the girls? Or is this the one that walked around with an erection?
 - c. How dare these girls not want to live in his 24/7 porn fantasy.
 - d. He is a predator, no other explanation needed.
 - e. This over 6 ft. dude would sit in the sorority ogling the women with a pillow in his lap. He's just as bad as the so-called trans perv who wanted to work at Hooters.
 - f. A fat ugly man (probably a pervert) with nowhere else to turn to except being trans, that's rich
 - g. “Looking for community “my ass. The bastard stands in the bathroom watching them shower with a hard on. He's not a woman. He doesn't even pretend to be a woman. He's just a horny dude, gaming the system.
 - h. He was also getting little hard-ons by looking at the girls when they were coming from the shower and would linger around the bathroom. Some people just want to be left alone to wear women's clothes and some dudes in chic's clothes are just perverted cunts that need to fuck off.
 - i. This dude proved to be a sex pest

- j. This shit happened in WYO because he's from out of state and so are the judges. He stalks the girls, asks them incessant personal questions, walks around with a constant boner and makes no effort to transition at all.
- k. This man should be in a locked mental asylum. No seriously. He should be in a psychiatric facility yesterday.
- l. Is this the same guy who was pleasuring himself as he watched his "sisters" get out of the shower?
- m. A tra**y porn addict joined a sorority.
- n. This is the sorority where the women sued and lost the case. The guy sits in the hallway wearing tight leggings semi-aroused and watches the women in the house come and go from the bathroom. Fucking disgusting. The sorority organization is allowing this to happen
- o. This is the man who would stare at them as they changed. Nobody turned on them, they never changed, they were never accepting of him.
- p. The fathers of the girls in the sorority should have had a little talk with this sideshow exhibit
- q. Yeah they were sick of the pervert among them.
- r. A *perv* joined a sorority.
- s. He was a man who wanted access to women, he was a threat to those women
- t. Didn't he also watch them changing with his boner in view? Not sure any of his sisters were able to do that. Mind you it's only really something a man can do so.
- u. He didn't join a sorority. He forced his way in and violated boundaries, repeatedly, then cried victim when some of the women pushed back.

- v. The problem though is that they originally changed their bylaws to be more woke & accept men in their sorority. It wasn't until he was perving on them in their lodgings that they realized it wasn't such a good idea. It was so stupid of them for even letting him in to begin with.
- w. This man is an autogynophiliac forcing himself into women's spaces.
- x. Is that the one who has an erection when his sorority sisters are around him?
- y. Allow me to translate: a perverted male got kicked out of an all female sorority, once they realized he was just a straight male with a fetish.
- z. A guy pretending to be a girl to live with girls is perverted. Why is this still being allowed?
- aa. He regularly got erections when he was with the women. Absolutely insane and disgusting. Sadly the sorority still has not done the right thing by the women.
- bb. Artemis Langford is 6'2" and 260 pound man in a house that has no locks on the bedrooms and there was no one close to her size. He got erections, never dressed as a woman and had a 1.8 GPA when its required to have a 2.7 GPA If they disagreed with him or when he didn't get his way he would threaten to sue them for Discrimination. The sorority members were told if they didn't vote him in they were transphobic.
- cc. The perverted, mentally ill man's name is Artemis Langford if you want to look him up. He has a deep voice. Can you imagine how that sounded to a house full of females. 6 girls sued to get him out of the sorority but the judge denied it.
- dd. He's a filthy fucking predator. Sometimes you just have to say what it is.
- ee. A guy invaded a sorority successfully.

- ff. Making your sisters look at your boner through your leggings while ogling them will do that.
 - gg. A [#FailedMale](#) tried to intrude into women's intimate space by pretending to be a woman. The sorority sisters smelt his XY chromosomes and kicked his large ugly arse out.
 - hh. He is a hefty fucking perverted bloke!
 - ii. Erm... more like young women quite reasonably didn't want to be sharing living quarters with a bloke with mental health issues who was visibly aroused in their presence...
 - jj. They weren't his sisters, they were his prey.
 - kk. That man should be in a secure mental hospital where he can be as mentally disordered as he likes but cannot menace women or girls.
8. Ms. Langford remains a college student at University of Wyoming who is facing severe, pervasive stigma and prejudice as a result of the unnecessary allegations in this suit.
 9. Even ongoing status conferences regarding whether Plaintiffs intend to amend have resulted in widespread damage to Ms. Langford's reputation.
 10. Additionally, despite Plaintiffs' claims before this Court that they are unaware who is platforming this negative attention directed at Ms. Langford, their group @Save_Sisterhood has actively participated in reposting many of the articles Plaintiffs claim to have no knowledge of.⁴

⁴ Attached hereto as Exhibit 11 is a true and accurate copy of a repost from @Save_Sisterhood of the social media post previously provided to this Court in ECF 49-19.

11. Ms. Langford, therefore, respectfully requests this Court take notice of the renewed harassment Ms. Langford is facing with every proceeding in this matter as evidence of ongoing prejudice.
12. Ms. Langford renews her request for dismissal with prejudice and asks to be excused from this Court's May 23, 2025 hearing so that she need not endure another round of public harassment. [ECF 49; 49-1; 54].

Dated 03/27/2025.

/s/ Rachel Berkness
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Attached hereto as Exhibit 12 is a true and accurate copy of a repost from @Save_Sisterhood of the social media post previously provided to this Court in ECF 49-19.

Attached hereto as Exhibit 13 is a true and accurate copy of a repost from @Save_Sisterhood of the social media post previously provided to this Court in ECF 49-52.

Attached hereto as Exhibit 14 is a true and accurate copy of a repost from @Save_Sisterhood of the social media post previously provided to this Court in ECF 49-31.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 27th day of March 2025.

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/s/ Rachel Berkness

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